

Docket Number 06-SPPE-2
First Round Data Requests
El Centro Unit 3 Repower Project
July 2006

DATA REQUEST #22
VISIBLE PLUME MODELING

BACKGROUND

The visible water vapor plume discussion provided in the Visual Resources section of the SPPE (Section 6.11) states that the potential for formation of visible plumes is considered negligible and will create no additional impact. It is not clear if the Applicant conducted a modeling analysis of vapor plumes to support this conclusion since the SPPE did not contain any analysis.

DATA REQUEST

22. If the applicant performed a visible plume modeling analysis in support of the SPPE Visual Resources conclusion, please provide the following:
- a. modeling results;
 - b. any meteorological data used in the analysis;
 - c. a full discussion of all assumptions;
 - d. the name and version of the model used; and
 - e. all model input and output files.

DATA RESPONSE

IID did not perform a visible plume modeling analysis as part of the SPPE. As presented in the SPPE application the Unit 3 Repower Project will utilize the existing Unit 3 cooling tower, which is currently in operation as part of the existing ECGS Unit 3. The Applicant assumed that there would not be an increase in any visible plume as a result of the Project since the Project would utilize the existing operating cooling tower. Therefore, the Unit 3 Repower Project would not create any "new" impacts as a result of the Project. Furthermore, the existing cooling tower is being retrofitted with new drift eliminators, which meet the best available control technology (BACT). Any visible plume associated with the existing cooling towers will be improved to BACT levels as part of this Project.